

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

MICHAEL JENKINS, *et al.*

Plaintiffs,

v.

RANKIN COUNTY, MISSISSIPPI, *et al.*,

Defendants.

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**Civil Action No.
3:23-cv-374-DPJ-ASH**

DECLARATION OF TECHNICAL DIFFICULTIES WITH ATTACHMENTS

Please take notice that plaintiffs' were unable to file some, but not all of their eleven (11) attachments to Plaintiffs' Opposition to Defendants' Motion for Summary Judgment [Doc. No. 146], in a timely manner due to technical difficulties. The deadline for filing the was April 14, 2025. The reason that the undersigned was unable to file all eleven of their attachments in a timely manner and the good faith efforts I made prior to the filing deadline to both file in a timely manner and to inform the court and the other parties that I could not do so are set forth below.

I. Statement of Reasons and Good Faith Efforts to File and to Inform

On April 14, 2025 plaintiffs filed their Opposition to Defendant's Motion for Summary Judgment [Doc. 146]. Unfortunately, the filing of the Motion and all the attachments could not be made in a single filing due to the ECF citing *Error File: C:\fakepath*. Plaintiffs tried many different methods to upload the filings at once, or in different groups, but were unsuccessful,

resulting in the necessity to timely file Doc's 147 and 148 as separate attachments to Doc. 146. Due to these technical difficulties, attachments in Doc. 149 [Ex. 9,10,11] and Doc. 150 [Ex. 8] had to be filed separately on April 15, 2025 at 12:21am CDT, and 12:36 am CDT, respectively.

On this morning, April 15, 2025, counsel for plaintiffs contacted both chambers and the clerk of the court and was instructed to file this *Notice of Technical Difficulties*, and was further instructed to split up the file, in order to reduce the size of the file. Upon review, Counsel informs the Court that successfully filed attachments, such as Doc. 147 [Ex. 6] are actually larger (3.4 MB) than files that were rejected by ECF, such as Ex. 5, which is only 2 MB.

Regardless, Counsel has been able to complete this technical procedure and is hereby submitting attachments 5A, 5B, 7A, and 7B with this filing.

Counsel for Plaintiffs' certify they have proceeded in good faith, and plead the Court to accept all attachments filed after the April 14, 2025 deadline as timely due to these technical difficulties.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

/s/ MALIK SHABAZZ ESQ /S/

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